

Fact Sheet



For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on August 31, 2010.

Permit Number: **R30-07300003-2010**
Application Received: **February 11, 2011**
Plant Identification Number: **07300003**
Permittee: **CYTEC Industries Inc.**
Facility Name: **Willow Island Plant**
Manufacturing Unit: **Polymer Additives (Part 4 of 4)**
Mailing Address: **1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM02* Revised: *Proposed*

Physical Location:	Willow Island, Pleasants County, West Virginia
UTM Coordinates:	474.00 km Easting • 4,356.00 km Northing • Zone 17
Directions:	From Interstate 77, Exit 179, take State Route 2 north for approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

Facility Description

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. Plant operations are divided into the following three manufacturing units and one support services unit: Urethane Chemicals (Part 1 of 4), Surfactants (Part 2 of 4), Site Services (Part 3 of 4), and Polymer Additives (Part 4 of 4).

The Polymer Additives Manufacturing Unit (SIC: 2869, 2899, and 2399) manufactures ultraviolet light absorbers, antioxidants and anti-static agents. The light absorbers are used in all types of plastics (bottles, telephones, lawn furniture, auto parts), in coatings, and in sunscreens. Antioxidants are used in man-made fibers, rubber products, plastics, and in medical applications. Anti-static agents are used in the electronics industry, in copy machine toner, and in textile applications.

The changes in this modification are based on revisions made to the Polymer Additives Manufacturing Unit (Building 82) in the second half of 2010.

Emissions Summary

There are no changes in emissions associated with this modification.

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of VOC, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2156N	3/3/2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes in this modification are based on revisions made to the Polymer Additives Manufacturing Unit (Building 82) in the second half of 2010. Written notification of revisions to this unit are required semi-annually per Condition 4.5.4.

Based on this notification, the following changes were made:

- The emissions units table was updated for minor equipment changes. These changes include:
 - Removal of the Formic Acid Head Tank (Emission Unit: 10GX)
 - Addition of the MIBK Storage Tank (Emission Unit: 25HX), which is being placed back into service after being inactive.
 - Vapor Return Line addition for Emission Units 23PX & 25HX. (Control ID: 23HC)
- Condition 4.1.14, which lists intermittent use equipment, received the following updates:
 - A Splitter Bowl (Equipment ID: 20LX) was removed.
 - Since the MIBK Storage Tank is being placed back into service, it was removed from this condition.
- The following updates were made to Appendix A:
 - Emission Groups UV1164A, UV1164D, UV1164G, and UV1164L were added for Vapor Return Line 20KC. This is not an equipment change at this facility; it is a revision to the table in Appendix A allowing it to more correctly represent the facility's configuration.
 - Vapor Return Line 23HC, which was added to the emission units table, was also added to Appendix A.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

There are no modifications at this facility that would have triggered a PSD permitting action, therefore there are no applicable Greenhouse Gas Clean Air Act requirements.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.